

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

ABELSON & TRUESDALE, LLC

147 Union Avenue, Suite 1E

Middlesex, New Jersey 08846

By: Bruce C. Truesdale, Esq., (BCT 0928)

(732) 302-9600

Attorney for Debtors

In Re:

ROBERT K. BRYANT

LYNN E. BRYANT

Case No.: 12-33883

Adv. No.: None

Hearing Date: 2/26/2013

Judge: Michael B. Kaplan

NOTICE OF OBJECTION TO PROOF OF CLAIM AND
NOTICE OF MORTGAGE PAYMENT CHANGE

TO:

U.S Department of Justice
Office of the United States Trustee
District of New Jersey
One Newark Center
Suite 2100
Newark, New Jersey 07102

Albert Russo, Standing Trustee
1 AAA Drive
Robbinsville, New Jersey 08691

Robert and Lynn Bryant
433 Shirley Parkway
Piscataway, New Jersey 08854

CitiMortgage, Inc.
PO Box 6030
Sioux Falls, SD 57117-6030

Joel Ackerman, Esq.
Zucker, Goldberg & Ackerman, LLC
200 Sheffield Street
Mountainside, New Jersey 07092

PLEASE TAKE NOTICE that on 02/26/13 at 9:00 am or as soon thereafter as counsel

may be heard, the undersigned attorney for the Debtor, will move before the Honorable Michael B. Kaplan sitting in the United States Bankruptcy Court, 402 East State Street Trenton, New Jersey for entry of an Order Modifying a Proof of Claim filed in the Debtors' case and Notice of Mortgage Payment Change, filed by CitiMortgage, Inc.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one, in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to permit the Debtors to sell real property or if you want the Court to consider your views on the motion, then 7 days before the return date of **2/26/2013**, before the Honorable Michael B. Kaplan sitting in the United States Bankruptcy Court, 402 East State Street Trenton, New Jersey, you or your attorney must:

File with the Court a written response explaining your position at:

United States Bankruptcy Court
District of New Jersey
Office of the Clerk,
402 East State Street
Trenton

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above. You must also mail a copy to:

ABELSON & TRUESDALE, LLC
147 Union Avenue, suite 1E
Middlesex, New Jersey 08846

Albert Russo, Standing Trustee
1 AAA Drive
Robbinsville, New Jersey 08691

Attend the hearing scheduled to be held on **2/26/2013**, before the Honorable Michael B. Kaplan sitting in the United States Bankruptcy Court, 402 East State Street Trenton, New Jersey

TAKE FURTHER NOTICE that answering papers and briefs, if necessary, or a statement that no answering brief is necessary and the basis thereof, shall be filed seven (7) days before the dated noticed for argument. This Motion/Application shall be deemed uncontested unless responsive papers are filed seven (7) days prior to the date of this Motion/Application and state with particularity the basis for the opposition.

If you do not take these steps, the Court may decide that you do not oppose the entry of the relief sought in the Motion/Application and may enter an order granting that relief.

**STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN ACCORDANCE WITH
D.N.J. LBR 9013-2**

This Motion/Application requests an Order Modifying a Proof of Claim filed in the Debtor[s]' case under Chapter 13 as well as a Notice of Mortgage Payment Change.

The facts relied on by the Debtors/Petitioners that are set forth in this Motion do not present complicated questions of fact or unique questions of law. Therefore, no brief is necessary for the Court's consideration of this Motion/Application.

Date: January 18, 2013

/s/Bruce C. Truesdale
Bruce C. Truesdale Esquire
Attorney for Debtor